

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

JAVIER SEGOVIA MENDIOLA

Plaintiff,

v.

**KENNETH P. HARTLEY and KEVIN
P. HARTLEY, HARTLEY
PRODUCE, LLC, and B & H FARMS,
LLC**

Defendants.

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CIVIL ACTION NO. 7:22-cv-00401

DEMAND FOR JURY TRIAL

PLAINTIFF'S DISCLOSURE OF INTERESTED PARTIES

Plaintiffs hereby certify that the following persons or entities have a financial interest in the outcome of this litigation:

1. Javier Segovia Mendiola
c/o Texas RioGrande Legal Aid
1206 E. Van Buren Street
Brownsville, Texas 78520
Plaintiff
2. Texas RioGrande Legal Aid
1206 E. Van Buren Street
Brownsville, Texas 78520
Attorneys of Record for Plaintiffs
3. Kenneth P. Hartley
4615 S. Bridge Avenue
Weslaco, Texas 78596
Defendant
4. Kevin P. Hartley
4615 S. Bridge Avenue
Weslaco, Texas 78596
Defendant
5. B & H Farms, LLC

4615 S. Bridge Avenue
Weslaco, Texas 78596
Defendant

6. Hartley Produce, LLC
4615 S. Bridge Avenue
Weslaco, Texas 78596
Defendant

If Plaintiffs become aware of the existence of any other entity that has a financial interest in the outcome of this litigation, Plaintiffs will file an amended certificate.

Dated: November 28, 2022

Respectfully submitted,

TEXAS RIOGRANDE LEGAL AID

/s/ A. Vail Kohnert-Yount

A. Vail Kohnert-Yount
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ATTORNEY-IN-CHARGE FOR PLAINTIFF

Alan A. Dicker
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(*Pro hac vice* motion forthcoming)

Lakshmi Ramakrishnan
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of November, 2022 a true and correct copy of the foregoing document was served on Defendants via personal service:

Kenneth P. Hartley
4615 S. Bridge Avenue
Weslaco, Texas 78596

Kevin P. Hartley
4615 S. Bridge Avenue
Weslaco, Texas 78596

B & H Farms, LLC
4615 S. Bridge Avenue
Weslaco, Texas 78596

Hartley Produce, LLC
4615 S. Bridge Avenue
Weslaco, Texas 78596

/s/ A. Vail Kohnert-Yount
A. Vail Kohnert-Yount